

## Brooke Klingbeil

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**From:** Jen DeMaster <Jennifer@demasterlaw.com>  
**Sent:** Wednesday, February 14, 2024 8:52 AM  
**To:** Warren Buliox; Kerrie Murphy; James E. Bartzen  
**Cc:** Paralegal; Brooke Klingbeil; Trisha Simcox; Julie Bittner; Joseph M. Russell  
**Subject:** RE: Wolf v. City et. al.

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To all counsel: My client has decided to no longer file this joint motion for a protective order. Based on new information and a review of the issues in this case, along with our review of Attorney Murphy's email from Friday, we will not be agreeing to a joint motion for a protective order with the City Defendants. Mr. Wolf will file his own protective order for (1) *his* confidential information that's been requested of him, and (2) protections to avoid intimidation or abusive presence at his deposition. Please let me know whether you object to or oppose Mr. Wolf filing this protective order.

We have a strong interest in protecting Mr. Wolf's confidential information, so we will file a motion to that effect only regarding Mr. Wolf's confidential information. We cannot forego protections for Mr. Wolf any longer in order to facilitate the defendant public officials' efforts to conceal their wrongdoing and involvement. That is not the purpose of a protective order.

This makes more sense given the disputed provision and scope of confidential information at issue.

My client will file a protective order for himself that will concern only *my client's* confidential information (medical, health, employer, and protections for his deposition in light of new information). **\*\*Further\*\*** My client no longer agrees to Donohue and Adams being present at his deposition, nor any attempt by any counsel to intimidate him with a show of force by having more than 6 people present **total**. We have conferred about this, and while I was previously willing to help convince him to allow Donohue and Adams in person, new information has come to his attention that requires an order to this effect and we cannot permit the City Defendants to be physically present. We continue to agree to February 29 and to the location. This case has been going on for a year and all of the Defendants have all information about the facts. There is no reason for large firms with all this information to require the presence of their clients unless this is an effort to intimidate or further injure my client.

Although I will address these issues in a follow up email responding to Kerrie's February 9 "Discovery Dispute" email, **please let me know as soon as practicable whether you will object to Mr. Wolf's protective order for (1) his own confidential information that's been requested and (2) protections at his deposition to avoid intimidation or harassment.**



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jennifermaster.com](mailto:jen@jennifermaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Jen DeMaster

**Sent:** Sunday, February 11, 2024 8:55 PM

**To:** 'Warren Buliox' <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; 'Kerrie Murphy' <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; 'James E. Bartzen' <[jbartzen@boardmanclark.com](mailto:jbartzen@boardmanclark.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; 'Brooke Klingbeil' <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; 'Trisha Simcox' <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; 'Julie Bittner' <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>; 'Joseph M. Russell' <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>

**Subject:** RE: Wolf v. City et. al.

Joe and Attorney Bartzen:

My apologies for emailing on a Sunday. I will file the joint motion for a protective order with the Sheboygan Defendants tomorrow (Monday). I have added 1 line to Warren's edits that state "jill hall does not join this motion but has indicated that she does not oppose a protective order in this matter." Let me know whether you object to the motion. You have had this motion for a few weeks now. If I don't hear from either of you tomorrow, I will indicate as such on the motion.

To all other counsel on this email:

I recognize that over the past 2 weeks since I spoke on the phone with Kerrie, you have each sent me several emails about various matters I've raised, and I want you to know that I will respond to those. I recognize some communications are with different counsel, but related to the same topics (ESI, custody etc.). I will address each of these as I am able this week.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jennifermaster.com](mailto:jen@jennifermaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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---

**From:** Jen DeMaster

**Sent:** Thursday, February 8, 2024 12:08 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; James E. Bartzen <[jbartzen@boardmanclark.com](mailto:jbartzen@boardmanclark.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>; Joseph M. Russell

<[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>

**Subject:** RE: Wolf v. City et. al.

Warren,

I, too, was waiting for confirmation from Attorneys Russell or Bartzen, though I know Attorney Bartzen may have to catch up on some of these communications. As stated before, my client is fine with the language your clients added to the joint motion and the way it appears per your January 22 (WEB) attachment. Per your request, I've added both draft protective orders that would be attached to the motion (only distinction being the disputed provision).

Attorney Bartzen,

I represent the plaintiff Todd Wolf in this matter. As Warren stated, we have been working through language for a protective order in this matter. As I told Attorney Russell before, there is only one disputed provision, and it does not pertain to productions by your client in discovery. If you would prefer the joint motion have different language pertaining to your client's respective position regarding the draft protective orders, please let me know.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Thursday, February 8, 2024 11:42 AM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; James E. Bartzen <[jbartzen@boardmanclark.com](mailto:jbartzen@boardmanclark.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>

**Subject:** RE: Wolf v. City et. al.

Hi Jen,

Just wanted to follow up on this again and close the loop. Can you confirm the two attachments to the motion per my email from last week. If so, and assuming James agrees to the motion, you can move forward with filing.

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Warren Buliox

**Sent:** Monday, February 5, 2024 9:54 AM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[Brooke.Klingbeil@mwhlawgroup.com](mailto:Brooke.Klingbeil@mwhlawgroup.com)>; Trisha Simcox <[Trisha.Simcox@mwhlawgroup.com](mailto:Trisha.Simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@mwhlawgroup.com](mailto:julie.bittner@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Good morning,

We wanted to circle back on this quickly.

Jen, as indicted below, I am good with you attaching my e-signature if my edits are incorporated. Can you confirm the two attachments to the motion per my email from last week.

Joe, are you good with everything?

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



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Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Warren Buliox

**Sent:** Monday, January 29, 2024 5:39 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[Brooke.Klingbeil@mwhlawgroup.com](mailto:Brooke.Klingbeil@mwhlawgroup.com)>; Trisha Simcox

<[Trisha.Simcox@mwhlawgroup.com](mailto:Trisha.Simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@mwhlawgroup.com](mailto:julie.bittner@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Jen,

You have my permission to place my e-signature on the joint motion if my edits are incorporated. To ensure we are all on the same page, for the two versions of the protective order, are you referring to the drafts sent in the attached January 16 email?

—Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Monday, January 29, 2024 4:40 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Warren: we have no issue with the language that you added so long as you know that we will attach both proposed protective orders as we provided earlier. If I agree to incorporate your edits to the joint motion, do I have your consent to sign your name?

Joe: same question – we are agreeing to incorporate the edits to the Joint motion that the City Defendants raised from Warren’s email. Let me know whether your client consents to this language and whether I may sign your name to the joint motion (with the edits from Warren/Sheboygan Defendants).

Thank you both.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Monday, January 22, 2024 7:12 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

Jen,

If our language is duplicative of the local rules than there is no harm in including the language. That said, and to help get us through this, I'm fine with us not having the specific language included regarding transcripts, interrogatories, etc. and just going with reference to, and agreement to abide by, the local rule. As for the draft motion to the court, please see the attached for my thoughts on it and let us know what your thoughts are.

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



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735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Tuesday, January 16, 2024 6:31 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Joe, Warren, and Kerrie: Please let me know whether I can sign your names to the attached Joint Motion for a protective order and conference with the Court so that I can file this by Thursday 1/18/2024 or Friday at the latest.

Warren: Thanks for the follow up and response. Regarding the provision relating to depositions, interrogatories, or other answers that we previously stated we would not oppose (from our PO Draft 3, Section (D)(2)). Plaintiff has reviewed Local Rule 79(d) referenced in that provision, and the language you requested is set out—almost verbatim—in Rule 79(d)(6) and the comments to the Rule and other rules adopted by this Court; and therefore, we have not included that language because it is unnecessarily duplicative and incorporated into the protective order by reference to Rule 79(d). Plaintiff would like to avoid further complications or confusions to the extent that the Local Rules address filings under seal, including filings of interrogatories, responses, etc. For your convenience, please review Local General Rule 79(d)(6) and the comments to the Local Rules that addresses the provision you requested. If you are requesting more protections than those afforded by this Court's Local Rules (e.g. filing an entire document under seal rather than redacting any protected or confidential portions), then we object to that inclusion to the extent it contradicts the guidelines in the General Local Rule 79 and rules set forth by this Court. Regarding your earlier question about obtaining your availability to request a conference, I do not believe we must provide our availability, but I am sure that if the Court feels that a telephonic conference would facilitate an agreement or resolution of this matter, then the Court will probably contact us directly to get our availability (?). In any event, this telephone conference should not take longer than 15 minutes or so, but the joint motion we've provided here gives the Court an option to rule on one of the proposed protective orders without a conference.

Joe: Again, this disputed provision does not apply to your client. Please let me know whether I can sign your name to the joint motion attached here.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Tuesday, January 16, 2024 4:44 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

Hi Jen,

We are amenable to doing a joint motion. Assuming Joe is in agreement, can you send over a draft of the motion and attachments?

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Friday, January 12, 2024 10:57 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Hi Warren:

We do not agree to that additional language in the public records provision in the protective order.

We do agree to the language regarding depositions and interrogatories as stated earlier.

Joe and Warren: I am proposing at this time that we file a "joint motion for a conference and protective order" and that we note in the motion itself exactly which provision is still in dispute (public records provision). I am also proposing that we file two separate copies of the protective order (1 agreed to by the Defendants with Defendants' additional language in the public records provision and the other agreed to by the Plaintiff that includes Plaintiff's language). Both versions may include the provision about interrogatories and depositions.

If you are alright with this, I will be drafting the joint motion and both Protective Order versions this weekend to send you so that I can file this with the Court early next week since any conference or order on this should not take long as it only pertains to 1 provision.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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---

**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Thursday, January 11, 2024 2:00 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

Good afternoon Jen,

On the public records issue, we can agree to the following language:

“Neither the City of Sheboygan nor its officials herein may designate any information or documentation requested in this matter as “Confidential” or “Attorney Eyes Only” where the information or documentation requested has previously been released by the City of Sheboygan in response to a public records request unless the information or documentation is protected from disclosure under the attorney-client privilege, work product doctrine, and/or any other reasonably applicable privilege or immunity from disclosure.”

On the 502 privilege paragraph, we understand the context and parameters of the rule but, regardless of that particular rule of evidence, we intend to assert privilege when appropriate.

Finally, back with “Draft 3” of the protective order, you indicated in a comment on page 8 (under Paragraph C) that you would not oppose inclusion of language regarding interrogatories, deposition transcripts, etc. if the Sheboygan Defendants insisted on it. Sheboygan Defendants would like this language included.

Thanks again, and please let me know your position and if you would like to discuss any of this.

—Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



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735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

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**From:** Warren Buliox

**Sent:** Wednesday, January 10, 2024 10:59 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[Brooke.Klingbeil@mwhlawgroup.com](mailto:Brooke.Klingbeil@mwhlawgroup.com)>; Trisha Simcox <[Trisha.Simcox@mwhlawgroup.com](mailto:Trisha.Simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@mwhlawgroup.com](mailto:julie.bittner@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Thank you Jen. I should be able to get back to you on this tomorrow morning or early afternoon.

—Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Tuesday, January 9, 2024 1:23 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Joe and Warren:

Attached to this email are 2 documents: (1) The **\*UPDATED\*** "Draft 4" that reflects the most recent edits/deletions and comments re: which provisions are still in dispute or have been agreed to; and (2) a Draft "Agreement" to be bound by this Order that was raised by Joe in his previous response. (I have not seen a draft Agreement from the Sheboygan Defendants (unless I am mistaken in this, warren?)). Please review these attachments and let me know whether this looks alright or which provisions are still in dispute.

Warren: Thanks for your response. To keep things simple, here's where we're at:

- Plaintiff will agree to delete the definitions language in its entirety as requested by the Defendants.
- The "public records" provision needs to stay in, but we have narrowed and more clearly delineated the provision to read as follows: "Neither the City of Sheboygan nor its officials herein may designate any information or documentation requested in this matter as "Confidential" or "Attorney Eyes Only" where the information or documentation requested has previously been released by the City of Sheboygan as a public record under Wisconsin's public records laws (see e.g. Wis. Stats. 19.31 – 19.39) under any provision of this order." *(Note this does not pertain to Defendant Hall).* **\*\*Please note – this is meant to avoid wastes of resources for the parties and the Court.**
- Warren: Regarding the 502(d) privilege provision—we are willing to delete the "in these proceedings" language that your clients' requested **\*so long as\*** your clients understand that the language we added did not alter, modify, nor change the scope of a standard Rule 502(d) provision. We can agree to that deletion, but do not

want to have to exhaust resources if the scope of Rule 502(d) is improperly expanded to withhold information altogether that has been otherwise published outside of discovery or this litigation. I have searched sample 502(d) orders/provisions and have found many that include this language (“in this litigation” or “in this case” or “in these proceedings”) as that is the standard scope of this provision. See e.g. <https://www.flsd.uscourts.gov/sites/flsd/files/Sample%20Rule%20502%28d%29%20language.pdf>; and see <https://ir.lawnet.fordham.edu/cgi/viewcontent.cgi?article=4872&context=flr>. Again, neither the inclusion nor exclusion of the “in these proceedings” language alters or modifies the scope or definition of Rule 502(d)’s reach.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jennifermaster.com](mailto:jen@jennifermaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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---

**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Monday, January 8, 2024 5:22 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>; Julie Bittner <[julie.bittner@MWHLawGroup.com](mailto:julie.bittner@MWHLawGroup.com)>

**Subject:** RE: Wolf v. City et. al.

Jen and Joe,

I was able to connect with the City on everything. On the proposed definition of Confidential Information, we continue to believe that a definition is not needed but, as a compromise, we will agree to the following language:

“Confidential Information” includes but is not limited to: (a) information protected from disclosure by statute, the attorney-work product, the attorney client privilege, or any other recognized privilege (including information gathered in anticipation of litigation); (b) information that reveals trade secrets; (c) research, technical, commercial or financial information that the party has maintained as confidential; (d) medical or healthcare information concerning any individual; (e) personal identity information; (f) personnel or employment records (g) information of a person who is not a party to the case that has been maintained as confidential; and (h) any portions of depositions (audio or video) where Confidential Information is disclosed, discussed or used as exhibits. However, the foregoing is not intended to prohibit a party from designating a document as Confidential Information that is not specifically set forth herein.

With this, we deleted the sentence regarding the foregoing not being an exhaustive list and inserted your added language at the end. We kept in our other edits to this language and added to subsection “a” references to information protected by privilege. Our agreement to this revised language is contingent upon either deleting the public records provision noted below or modifying it as suggested below. If this does not work, we will likely need to delete the definition section altogether.

Regarding the provision about public records, we continue to believe that this is not necessary but, as a compromise, will agree to modifying the provision to include language to the following effect at the end “ . . . unless the information is protected from disclosure under the attorney-client privilege, work product doctrine, and/or any other reasonably applicable privilege or immunity from disclosure.” Is this does not work, we will need to delete this provision.

As for the privilege section/language Joe proposed, we agree with Joe’s insertion and language. We are also fine with your edits Jen to this *except for the insertion of the phrase “in these proceedings.”* We do not agree to that.

Please let me know your position and whether we should discuss.

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Monday, January 8, 2024 2:10 PM

**To:** Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Hi all: We have incorporated our edits into Draft 4 to help narrow and aid in agreement on this order. We don’t object to a 502(d) provision in here, but we added a couple words to what Joe provided for clarification only. I have incorporated our edits (reflecting Warren’s requests) to **Draft 4** with Joe’s edits in the attached.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jennifermaster.com](mailto:jen@jennifermaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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---

**From:** Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>  
**Sent:** Monday, January 8, 2024 8:46 AM  
**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>  
**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>  
**Subject:** RE: Wolf v. City et. al.

I've attached my comments to what I believe is the current version. Also, unless I missed it, I don't think a draft stipulation addressing ESI protocol and privilege has been circulated. In light of that, I've redlined some provisions regarding privileged documents here. Looks like we also need the acknowledgment form by which individuals who review the confidential material agree to be bound by the PO.

**Joseph M. Russell | von Briesen & Roper, s.c.**  
Direct: 414-287-1414 | [joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)

---

**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>  
**Sent:** Sunday, January 7, 2024 2:21 PM  
**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>  
**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>  
**Subject:** [EXTERNAL] RE: Wolf v. City et. al.

Hi all: I will not go to the Court Monday (1/8). We can wait another couple days to allow counsel for the City to address the 2 provisions in Draft 5 internally as Warren stated he would do. If the City is not in agreement with these 2 provisions, there is no harm in asking the judge to weigh in on this once/if we determine that we are at an impasse.

Thanks all.

-Jen

---

**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>  
**Sent:** Saturday, January 6, 2024 6:34 PM  
**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>  
**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>  
**Subject:** RE: Wolf v. City et. al.

Evening Jen,

With all due respect, when you're talking about delays, please recall (and be sure to mention if this is brought to the Court) that you were provided with a draft of the protective order on December 8 and that you did not get back to us

until December 26 (18 days later and in the middle of the holidays and vacation schedules). Your purported concerns about delay ring hollow.

Also, are you saying you are going to unilaterally schedule a court hearing on Monday? We may end up needing to bring some or all of this before the Court but I'm pretty sure it does not work that way. Or, are you saying that you intend to request on Monday a hearing with the Court? If so, we should discuss dates for the hearing that you can propose in your motion to the court for a telephonic conference.

I'm always open to meet and confer over the phone if we cannot reach an agreement on our dispute. I'm still not clear on what your real concern is. Are you concerned that your client may publicize confidential information? Perhaps we're talking past each other with these emails and a conversation may help? Please let me know.

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Friday, January 5, 2024 8:47 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Warren: With respect, you've had these provisions since December 26. If your clients were so opposed to these provisions, this should have been addressed sooner to not delay discovery responses. I do not want to delay further. We will be taking this to the judge for a conference at 10am Monday morning. In good faith, I will utilize "Draft 5" that I previously provided with the Court to address this dispute. If you can come to an agreement before then to file Draft 5 as a stipulated proposed order, let me know before 10am on Monday.

Joe: Obviously, I'll loop all of you in on that so you can weigh in. You can review the provisions again as provided in Draft 5. (same 2 provisions just with further edits to accommodate the Sheboygan Defendants' requests).



**Jennifer DeMaster**  
Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Friday, January 5, 2024 7:27 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Jen,

We'll discuss internally and raise with our client and get back to you as soon as possible. Have a good weekend.

—Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Friday, January 5, 2024 6:46 PM

**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Joe:

Please see the revisions we've provided in consideration of the City's counsel's response. Please let me know whether you oppose these provisions or are willing to stipulate to these. If the City's counsel is not in agreement, I will seek a conference with the Court on Monday morning to address these provisions.

Warren:

The provisions I have requested are standard provisions. This appears to be a waste of time as subsection (a) in the Definitions covers much of what you would legitimately be concerned about. Subsection (h) you provided is redundant of the remaining definitions as portions of depositions marked confidential would be included in the order. We cannot concede on the public records provision. Please note – this only concerns public records (and communications therein) that have already been previously released by the government as such. I have edited that provision to clarify that.

At this point, if you can't agree to the attached edits, it may be best that we bring this to the judge so that we do not delay this any further. I will request a conference with the Court first thing Monday morning unless I get an agreement from you on these final edits so that we can avoid any further delays.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jennifermaster.com](mailto:jen@jennifermaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>

**Sent:** Friday, January 5, 2024 5:39 PM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Hi Jen,

Your response is unfortunate and I'm sorry you somehow mistakenly took my email as a threat. It was not my intent at all and, outside of that, I'm not clear on what the concern is. We certainly hope there is not an intent to disseminate confidential information from Mr. Wolf's camp. There is certainly none by Sheboygan Defendants and we are not threatened by enforcement of a Protective Order.

Regardless, if you continue to insist on a definition section for confidential information, we would be amenable to language to the following effect:

"Confidential Information" includes but is not limited to: (a) information protected from disclosure by statute; (b) information that reveals trade secrets; (c) research, technical, commercial or financial information that the party has maintained as confidential; (d) medical or healthcare information concerning any individual; (e) personal identity information; (f) personnel or employment records (g) information of a person who is not a party to the

case that has been maintained as confidential; and (h) any portions of depositions (audio or video) where Confidential Information is disclosed, discussed or used as exhibits. The foregoing is not an exhaustive list of documents that may be designated as Confidential Information and is not intended to prohibit a party from designating a document as Confidential Information that is not specifically set forth therein.”

Regarding the provision about public records, we do not believe that is necessary and do not agree to its inclusion. If something has been marked as confidential that you believe qualifies as a public record based on your interpretation and application of state law, the order provides a mechanism for you to raise that issue, for us to meet and confer on it and then to take it to the Court if we cannot come to an agreement.

Please let us know your position.

Thanks,

Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



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735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Friday, January 5, 2024 12:54 PM

**To:** Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

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Warren:

Given your threats last night regarding your intent to use the protective order as a “weapon” and, what appears to be, an apparent attempt to abuse confidentiality markings, I must rescind my previous edits and agreement to the stipulated Protective order. Specifically, in a communication last night, you stated, “we intend to enforce the Protective Order should there be any violations by him or those affiliated with him.” As such, I remain (and now am more) sincerely concerned that your clients intend to abuse confidentiality markings on public records and non-confidential information to facilitate threats on myself or my client. Most concerning is your clients’ refusal to permit definitions of legally acceptable “confidential information” or “attorney eyes only” materials by stating that we can “employ provision (D)” and confer/file motions for any disputes---which is a thinly veiled attempt to exhaust my client’s resources and avoid unnecessary conferences during discovery and endless disputes over “definitions” of confidential information where your (Sheboygan) clients wants to conceal evidence of their wrongdoing. It is not my job to tiptoe around

unintentional disclosures of public records based on your threats and facilitate your clients' efforts to conceal their own wrongdoing. Accordingly, I am asking, once again, that you include the following 2 provisions that you deleted: (1) legal definition of "confidential" information that lists examples of legally defined confidential information; and (2) provision that public records are not "confidential" information. I have attached our updated edits here.

Joe:

I apologize for any confusion as this relates to communications from Warren last night and threats to use this order as a weapon against us with unlimited undefined confidential markings, which I can no longer allow and need to request narrowing definitions of confidential information. You are free to edit a proposed order with the Sheboygan Defendants or provide your edits to my updated draft here.

Apologies again Joe and all, but I cannot allow this order to be used as a weapon or to exhaust resources, and thus, my prior narrowing definitions are required as provided in my updated edits. If the Sheboygan Defendants cannot agree on this, please let me know as soon as possible.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Jen DeMaster

**Sent:** Thursday, January 4, 2024 3:38 PM

**To:** Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Hi all: Thanks Warren and Joe for getting back to me on this. Comments are attached for Joe.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>  
**Sent:** Thursday, January 4, 2024 3:03 PM  
**To:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>  
**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>  
**Subject:** RE: Wolf v. City et. al.

Jen: I will hold off on any additional proposed revisions until you review and respond to Warren's redline and comments. Best, Joe

**Joseph M. Russell | von Briesen & Roper, s.c.**  
Direct: 414-287-1414 | [joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)

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**From:** Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>  
**Sent:** Thursday, January 4, 2024 2:11 PM  
**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; Joseph M. Russell <[joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)>  
**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>  
**Subject:** [EXTERNAL] RE: Wolf v. City et. al.

For the Sheboygan Defendants, attached please find our comments and edits to the draft protective order. I'm around today after 3:30pm to discuss if you would like. I'm also around tomorrow afternoon for a call. We'll check into and get back to you on our client's response to your request regarding expert disclosure deadlines.

-- Warren

**Warren E. Buliox**  
*Equity Partner*  
**D:** 414.509.7490  
**M:** 414.530.0200



**Milwaukee Office:**  
735 N. Water Street, Suite 610  
Milwaukee, Wisconsin 53202  
**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Warren Buliox  
**Sent:** Thursday, January 4, 2024 1:52 PM  
**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; [joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)  
**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Brooke Klingbeil <[Brooke.Klingbeil@mwhlawgroup.com](mailto:Brooke.Klingbeil@mwhlawgroup.com)>; Trisha Simcox <[Trisha.Simcox@mwhlawgroup.com](mailto:Trisha.Simcox@mwhlawgroup.com)>  
**Subject:** RE: Wolf v. City et. al.

Jen, I'm finalizing edits and comments to the draft you forwarded and will send that over shortly.

—Warren

**Warren E. Buliox**

*Equity Partner*

**D:** 414.509.7490

**M:** 414.530.0200



**Milwaukee Office:**

735 N. Water Street, Suite 610

Milwaukee, Wisconsin 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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**From:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>

**Sent:** Thursday, January 4, 2024 1:50 PM

**To:** Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; [joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Caution: This email originated from outside your organization. Please be careful when opening attachments and embedded links.

Dear Joe, Kerrie, and Warren,

I'm just following up on this, and was hoping it would be filed/entered prior to January 5 as you requested for your responses. Kerrie and Warren, please let me know if you will be filing your Joint Motion (from December 8) and the Protective Order I attached here (which is my December 26 red line edits and some stylistic/formatting changes-incorporated) before 4:00 pm tomorrow. If you no longer plan to file your Joint Motion, I would like to file the attached joint motion for this Protective Order (yours with my red line edits and formatting changes) tomorrow around 5:00 pm and want to know whether I may attach your names to this one.

Joe and Kerrie (or Warren), Please let me know whether you oppose this Joint Motion and Protective Order by 4 pm tomorrow (the attached PO is substantially the same as what Kerrie provided December 8 with my edits from December 26 plus stylistic/formatting as shown here) and whether you consent to me signing your names on this. Again, We will only file this if Kerrie and Warren do not file your previous Joint Motion with the Protective Order I attached here (edits incorporated).

Additionally, please let me know whether all of you would oppose or object to our requesting a short 2-week delay for Expert Witness disclosures—as we are seeking an extension only to February 1, 2024, given the holidays, delays in discovery responses, and our trying to come to an agreement for a Protective Order. We plan to file the separate motion to extend our Expert disclosures deadline next week.

Thank you and hope you all had a nice (somewhat restful) holiday and New year.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Jen DeMaster

**Sent:** Tuesday, December 26, 2023 1:20 PM

**To:** Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>; [joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** RE: Wolf v. City et. al.

Kerri, Warren, and Joe,

Please see our attached redline edits to the Protective Order draft you provided. I apologize for any delay over the holidays and with other case matters to attend to. Kerrie – I know I stated I could not find these on the website, but I did find the PO template at the end of the Local Rules via the Court's URL L.R. link.

I did not make too many substantial changes, and those made are either explained or self-explanatory. I did add a provision that we agree to confer (via email is fine/preferable for objections in writing) about any confidentiality designation disputes before filing any motion under Rule 37 as I suspect that will avoid repeated motions and unnecessary costs/resources.

Let me know if you have any questions. If you can agree to these edits without any further revisions, you may sign my name for filing. If you have any questions or concerns, let me know and we'll respond within the day to get that finalized for filing.

Thanks.



**Jennifer DeMaster**

Attorney, DeMaster Law LLC

Email : [jennifer@demasterlaw.com](mailto:jennifer@demasterlaw.com)

Email : [jen@jenniferdemaster.com](mailto:jen@jenniferdemaster.com)

Phone: 414-235-7488

Address: 361 Falls Rd #610, Grafton, WI 53024

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**From:** Kerrie Murphy <[kerrie.murphy@mwhlawgroup.com](mailto:kerrie.murphy@mwhlawgroup.com)>

**Sent:** Friday, December 8, 2023 11:45 AM

**To:** Jen DeMaster <[Jennifer@demasterlaw.com](mailto:Jennifer@demasterlaw.com)>; [joseph.russell@vonbriesen.com](mailto:joseph.russell@vonbriesen.com)

**Cc:** Paralegal <[Paralegal@demasterlaw.com](mailto:Paralegal@demasterlaw.com)>; Warren Buliox <[warren.buliox@MWHLawGroup.com](mailto:warren.buliox@MWHLawGroup.com)>; Brooke Klingbeil <[brooke.klingbeil@MWHLawGroup.com](mailto:brooke.klingbeil@MWHLawGroup.com)>; Trisha Simcox <[trisha.simcox@mwhlawgroup.com](mailto:trisha.simcox@mwhlawgroup.com)>

**Subject:** Wolf v. City et. al.

Jen and Joe

I have attached a Joint Motion for Protective Order and Stipulated Protective Order for your review and comment. This is taken for the form provided on the U.S. District Court – Eastern Division website. Please let me know if either of you have any requested revisions or if we are authorized to esign for each of you and get this filed.

**Kerrie M. Murphy**

*Managing Partner*

**D:** 515.657.5684



**West Des Moines Office:**

Regency West Office Park | Building 8

4350 Westown Parkway, Suite 120

West Des Moines, IA 50266

**T:** 515.453.8509 | **F:** 515.267.1408

**Milwaukee Office**

735 North Water Street | Suite 610 | Milwaukee | WI 53202

**T:** 414.436.0353 | **F:** 414.436.0354

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